

EXHIBIT A

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*Counsel for the Public Employees Retirement Association
of New Mexico and Proposed Lead Counsel for the Class*

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

DAVID C. WESTON, on behalf of himself
and all others similarly situated,

Plaintiff,

v.

PG&E CORPORATION, ANTHONY F.
EARLEY, JR., JASON P. WELLS, GEISHA
J. WILLIAMS, CHRISTOPHER P. JOHNS,
DINYAR B. MISTRY, and DAVID S.
THOMASON,

Defendants.

Case No. 3:18-cv-03509-RS

CLASS ACTION

**[PROPOSED] ORDER GRANTING
MOTION FOR CONSOLIDATION,
APPOINTMENT AS LEAD PLAINTIFF
AND APPROVAL OF SELECTION OF
LEAD COUNSEL**

AS MODIFIED BY THE COURT

(Caption continues on next page)

1 JON PAUL MORETTI, Individually and on
2 Behalf of All Others Similarly Situated,

3 Plaintiff,

4 v.

5 PG&E CORPORATION, ANTHONY F.
6 EARLEY, JR., JASON P. WELLS, GEISHA J.
7 WILLIAMS, CHRISTOPHER P. JOHNS,
8 DINYAR B. MISTRY, and DAVID S.
9 THOMASON,

10 Defendants.

Case No. 3:18-cv-03545-RS

Hon. Richard Seeborg

1 Having considered the Motion of the Public Employees Retirement Association of New
 2 Mexico (“PERA”) for Consolidation, Appointment as Lead Plaintiff and Approval of Selection
 3 of Lead Counsel (the “Motion”) in the above-captioned actions, all competing motions having
 4 been withdrawn, and good cause appearing therefor, the Court ORDERS as follows:

5 1. The hearing set for September 27, 2018 is vacated and the Motion is granted.

6 2. The above-captioned actions are consolidated for all purposes (the “Consolidated
 7 Action”). This Order (the “Order”) shall apply to the Consolidated Action and to each case that
 8 relates to the same subject matter that is subsequently filed in this Court or is transferred to this
 9 Court, and is consolidated with the Consolidated Action.

10 3. A Master File is established for this proceeding. The Master File shall be Civil
 11 Action No. 3:18-cv-03509-RS. The Clerk shall file all pleadings in the Master File and note
 12 such filings on the Master Docket.

13 4. An original of this Order shall be filed by the Clerk in the Master File.

14 5. ~~The Clerk shall mail a copy of this Order to counsel of record in the Consolidated~~
 15 ~~Action.~~

16 6. Every pleading in the Consolidated Action shall have the following caption:

17 IN RE PG&E CORPORATION SECURITIES
 18 LITIGATION

Civil Action No. 3:18-cv-03509-RS

19
 20 7. The Court requests the assistance of counsel in calling to the attention of the Clerk
 21 of this Court the filing or transfer of any case that may properly be consolidated as part of the
 22 Consolidated Action.

23 8. Each new case that arises out of the subject matter of the Consolidated Action
 24 shall be consolidated with the Consolidated Action. This Order shall apply thereto, unless a
 25 party objects to consolidation (as provided for herein), or to any provision of this Order, within
 26 ten (10) days after the date upon which a copy of this Order is served on counsel for such party
 27 by filing an application for relief, and this Court deems it appropriate to grant such application.
 28

1 Nothing in the foregoing shall be construed as a waiver of Defendants' right to object to
2 consolidation of any subsequently-filed or transferred related action.

3 9. PERA is appointed to serve as Lead Plaintiff in the Action pursuant to 15 U.S.C.
4 § 78u-4(a)(3)(B).

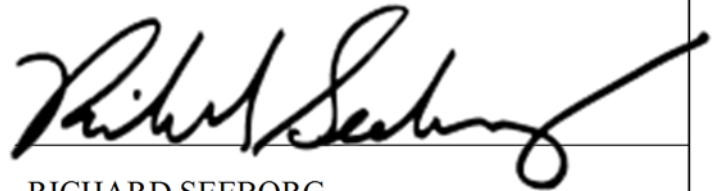
5 10. PERA's selection of Labaton Sucharow LLP as Lead Counsel and Kerr &
6 Wagstaffe LLP as Liaison Counsel for the Class in the Action is approved pursuant to 15 U.S.C.
7 § 78u-4(a)(3)(B)(v). Lead Counsel shall have the authority to speak for all Plaintiffs and Class
8 members in all matters regarding the litigation, including, but not limited to, pretrial proceedings,
9 motion practice, trial, and settlement. Lead Counsel shall make all work assignments in such a
10 manner as to facilitate the orderly and efficient prosecution of this litigation, and to avoid
11 duplicative or unproductive effort. Additionally, Lead Counsel shall have the following
12 responsibilities:

- 13 a. to brief and argue motions;
- 14 b. to initiate and conduct discovery, including, but not limited to, coordination of
15 discovery with Defendants' counsel, and the preparation of written interrogatories,
16 requests for admissions, and requests for production of documents;
- 17 c. to direct and coordinate the examination of witnesses in depositions;
- 18 d. to act as spokesperson at pretrial conferences;
- 19 e. to call and chair meetings of Plaintiffs' counsel as appropriate or necessary from time
20 to time;
- 21 f. to initiate and conduct any settlement negotiations with Defendants' counsel;
- 22 g. to provide general coordination of the activities of Plaintiffs' counsel and to delegate
23 work responsibilities to selected counsel as may be required, in such a manner as to
24 lead to the orderly and efficient prosecution of this litigation and to avoid duplication
25 or unproductive effort;
- 26 h. to consult with and employ experts;

- 1 i. to receive and review periodic time reports of all attorneys on behalf of Plaintiffs, to
2 determine if the time is being spent appropriately and for the benefit of Plaintiffs, and
3 to determine and distribute Plaintiffs' attorneys' fees; and
4 j. to perform such other duties as may be expressly authorized by further order of this
5 Court.

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7 IT IS SO ORDERED.

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11 DATED: September 10, 2018



12 RICHARD SEEBORG
13 UNITED STATES DISTRICT JUDGE
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